

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

Jessica Anderson	)	
	)	
Plaintiff,	)	Case No. C-1-02-355
	)	
vs.	)	Judge Weber
	)	
Avon Products, Inc.	)	Magistrate Judge Sherman
	)	
Defendant.	)	

**JOINT MOTION FOR EXTENSION OF THE DISPOSITIVE**  
**MOTION CUT OFF DEADLINE AND TRIAL DATE**

NOW COME Plaintiff Jessica Anderson and Defendant Avon Products, Inc., and for the reasons set forth in the attached Memorandum, jointly request an extension of the dispositive motion deadline and the trial date in the above-referenced matter.

Respectfully submitted,

s/Daniel A. Kruse (per phone authorization)

Daniel A. Kruse (0009201)

1029 Main Street

Cincinnati, Ohio 45202

(513) 241-3676

Trial Attorney for Plaintiff

s/Ellen J. Garling

Ellen J. Garling (0043554)

Jeffery L. VanWay (0069175)

Baker & Hostetler, LLP

Capitol Square, Suite 2100

65 E. State St.

Columbus, Ohio 43215

(614) 228-1541

Trial Attorneys for Defendant

**MEMORANDUM**

The dispositive motion deadline is currently set for September 24, 2003. The trial is set for the November 2003 term.

Counsel for Defendant commenced the deposition of Jessica Anderson on Thursday, June 5, 2003 but, due to time constraints, was unable to complete the deposition. Plaintiff's deposition was scheduled to be completed in September, but Plaintiff was unexpectedly hospitalized and unable to attend the deposition. As a result, the parties jointly request an extension of the motion cutoff date from September 24, 2003 to October 31, 2003 so that Plaintiff's deposition can be completed and a dispositive motion can be prepared.

The parties also move to extend the November trial date. This is a first time trial assignment and the first time either party has requested a continuance of the trial date. Defendant believes that its dispositive motion is well-founded and the Court should have sufficient time to consider the motion to save the expense of trial if a trial not necessary.

Respectfully submitted,

s/Daniel A. Kruse (per phone authorization)

Daniel A. Kruse (0009201)  
1029 Main Street  
Cincinnati, Ohio 45202  
(513) 241-3676

Trial Attorney for Plaintiff

s/Ellen J. Garling

Ellen J. Garling (0043554)  
Jeffery L. VanWay (0069175)  
Baker & Hostetler, LLP  
Capitol Square, Suite 2100  
65 E. State St.  
Columbus, Ohio 43215  
(614) 228-1541

Trial Attorneys for Defendant